

IN THE UNITED STATES DISTRICT COURT FOR MIDDLE DISTRICT OF PENNSYLVANIA

JEREMY BAILEY

PLAINTIFF,

V.

LIEUTENANT YODER,

JOHN DOE(S) et al.,

DEFENDANTS,

FILED  
SCRANTON

JUL 23 2021

PER

DEPUTY CLERK

NO. 1:20 - CV - 1836

DISTRICT JUDGE: KANE

MOTION FOR APPOINT OF COUNSEL

Pursuant to 28 U.S.C. 1915 (e) (1) plaintiff (or plaintiffs) moves for an order to appointing counsel to represent him in this case. In support of this motion plaintiff states:

1. Plaintiff is unable to afford counsel. He has requested leave to proceed in forma pauperis
2. Plaintiff imprisonment will greatly limited his ability to litigate. The issue involve in this case are complex, and will require significant research and investigation. Plaintiff has limited access to law library and limited knowledge of the law.
3. A trial in this case will likely involve conflicting testimony, and counsel would better enable to present evidence and cross examine witnesses.
4. Plaintiff has made repeated effort to obtain a lawyer.

WHEREFORE, plaintiff request that the court appoint counsel \_\_\_\_\_, a member of the \_\_\_\_\_ bar, as counsel in this case.

DATE:

JEREMY BAILEY

(SCI) COALTOWNSHIP

1 KELLEY DRIVE

COALTOWNSHIP, PA 17866.

NO: 1:20-CV-1836

DEAR HONORABLE YVETTE KANE

DISTRICT JUDGE KANE

I just received a motion from the defendant yoder lawyer in the above civil matter ,  
WHEREFORE, They petitioned the court for a deposition hearing

As you know Honorable kane , I am a pro se litigant, one who is unskilled in the art &  
science of civil law.

The Defendant Attorney has schdualed to Depose me, It would be greatly  
appreciated if you could appoint counsel so that i have equal opportunity as the Defendant do,  
to preserve my Rights under the U.S. CONSTITUTION.

THANK YOU IN ADVANCE,

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, consisting of a large, stylized 'J' or 'B' shape with a long horizontal stroke extending to the right.

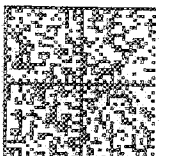
DEREMY BAILEY # L2443+  
(SCI) COALTOWNSHIP  
1 KELLEY DRIVE  
COALTOWNSHIP PA 17866

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SCRANTON

JUL 23 2021

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YETTE KANE  
DISTRICT Judge  
UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA  
235 NORTH WASHINGTON AVENUE  
P.O. Box 1148  
SCRANTON, PA 18501-1148